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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PAULA LANE, et al.,

Plaintiffs,

v.

JOHN KITZHABER, et al.,

Defendants.

Case No. 3:12-cv-00138-ST

DEFENDANTS' MOTION FOR
PROTECTIVE ORDER OR IN THE
ALTERNATIVE FOR AN EXTENSION OF
TIME TO RESPOND TO PLAINTIFFS'
REQUESTS FOR PRODUCTION

**ORAL ARGUMENT REQUESTED
EXPEDITED HEARING REQUESTED**

LR 7-1(a) CERTIFICATION

The parties made a good faith effort through telephone conferences to resolve the dispute and have been unable to do so.

MOTION

Pursuant to Fed. R. Civ. P. 26(c) and 26(b)(2)(C) and LR 26-4, defendants move the court for entry of a protective order directing plaintiffs to limit the number and scope of plaintiffs' requests for production to defendants. This motion is supported by the accompanying Defendants' Memorandum in Support of Motion for Protective Order.

DATED June 18, 2012.

Respectfully submitted,

JOHN R. KROGER
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s/ Christina L. Beatty-Walters
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